

FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON  
OCT 22 2021  
SEAN F. McAVOY, CLERK  
DEPUTY  
YAKIMA, WASHINGTON

United States District Court  
Eastern District of Washington

TOBIAS JEREMIAH LADDROUT

(In the space above enter the full name(s) of the plaintiff(s).)

-against-

YAKIMA COUNTY SHERIFF DEPARTMENT

YAKIMA COUNTY SHERIFF DEPUTY WARD

YAKIMA COUNTY JAIL

YAKIMA COUNTY CORRECTION DEPUTIES

(In the space above enter the full name(s) of the defendant(s).  
If you cannot fit the names of all of the defendants in the  
space provided, please write "see attached" in the space  
above and attach an additional sheet of paper with the full list  
of names. The names listed in the above caption must be  
identical to those contained in Section I. Do not include  
addresses here.)

1:21-cv-003140-SMJ

Case No. \_\_\_\_\_  
(To be filled out by Clerk's  
Office only)

**COMPLAINT**

Jury Demand?

☒ Yes

☐ No

**NOTICE**

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

If this is an employment discrimination claim or social security claim, please use a different form.

**Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.**

**I. PARTIES IN THIS COMPLAINT****Plaintiff**

*List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.*

Plaintiff:	Laddrout, Tobias, J		
	Name (Last, First, MI)		
	201 MaMa chat Lane		
	Street Address		
	Yakima, Wapato	Washington	98951
	County, City	State	Zip Code
	925-324-8534	tjladdrout@gmail.com	
	Telephone Number	E-mail Address (if available)	

**Defendant(s)**

*List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.*

Defendant 1:	Yakima County Sheriff		
	Name (Last, First)		
	1822 South 1 <sup>st</sup> Street		
	Street Address		
	Yakima, Yakima	Washington	98903
	County, City	State	Zip Code
Defendant 2:	Deputy N. Ward C. #102		
	Name (Last, First)		
	1822 South 1 <sup>st</sup> Street		
	Street Address		
	Yakima, Yakima	Washington	98903
	County, City	State	Zip Code

**Defendant(s) Continued**Defendant 3: Yakima County Jail – Correction DeputiesName (Last, First)111 North front StreetStreet AddressYakima, YakimaWashington98901County, CityStateZip Code

Defendant 4: \_\_\_\_\_

Name (Last, First)Street AddressCounty, CityStateZip Code**II. BASIS FOR JURISDICTION***Check the option that best describes the basis for jurisdiction in your case:*

- ☐ **U.S. Government Defendant:** United States or a federal official or agency is a defendant.
- ☐ **Diversity of Citizenship:** A matter between individual or corporate citizens of different states and the amount in controversy exceeds \$75,000.
- ☒ **Federal Question:** Claim arises under the Constitution, laws, or treaties of the United States.

If you chose "Federal Question", state which of your federal constitutional or federal statutory rights have been violated.

Yakama Nation Treaty of 1855 with the United States that the State of Washington lacksJurisdiction on trust land within the boundaries of the Yakama Indian Reservation overYakama Indians. That the plaintiff is Yakama Indian. That Deputy Ward of the YakimaCounty Sheriff kidnapped, assaulted, falsely arrested and falsely imprisoned the plaintiff.

### III. VENUE

*This court can hear cases arising out of. Yakama Indian Reservation*

*Under 28 U.S.C § 1391, this is the right court to file your lawsuit if: (1) All defendants live in this state AND at least one of the defendants lives in this district; OR (2) A substantial part of the events you are suing about happened in this district; OR (3) A substantial part of the property that you are suing about is located in this district; OR (4) You are suing the U.S. government or a federal agency or official in their official capacities and you live in this district. Explain why this district court is the proper location to file your lawsuit.*

Venue is appropriate in this Court because:

That the defendant is a Yakama Indian and that Yakima County Deputy did not have  
Jurisdiction

### IV. STATEMENT OF CLAIM

Place(s) of occurrence: 201 MaMachat lane Wapato, Washington on the Trust land Yakama Reservation

Date(s) of occurrence: 9-7-2018

*State here briefly the FACTS that support your case. Describe how each defendant was personally involved in the alleged wrongful actions.*

#### FACTS:

1. That Deputy Ward did not have jurisdiction over my person.

2. That 201 MaMachat Wapato 98951 is trust land held in truth by United States

3. My person is Yakama Native America.

4. Washington State denied Jurisdiction

5. Yakama Nation tribal court has accepted my person as Yakama Indian.

6. Eastern Washington Federal district Court accepted my person as Yakama Indian.

7. That my person was Kidnapped , assaulted, falsely arrested, falsely imprisoned .

On or about 9-7-2018 11:45 pm. Deputy Ward without Jurisdiction arrested my person.  
I pleaded with him I did not do anything; I was being detain by the Yakama tribal police.  
Yakama tribal pepper sprayed me in the face before Deputy Ward arrived to take my person  
in custody. Walking to the front of the house at 201 Mama chat lane the tribal police and  
Deputy Ward slammed my person to the ground on a large flower brick by the front door.  
I could not breathe because of the pepper spray and the impacted being slammed to the  
ground. Deputy Ward put his knee on my back and neck. Deputy Ward also put a mask over  
my face. The officers got me to my feet, but pants were down to my knees that prevented me  
from walking. So, the officers dragged me to Deputy Wards patrol car. I plead with Deputy  
Ward I did not do anything on the way to the Yakima county jail. Arriving to the Yakima  
County jail the Yakima County jail correction officers put me in a rub room. Correction  
Officers took my shoes and left my person in the rub room. I was burning up because of  
Pepper spray and started asking the correction officers to shower. The officer just ignored  
my request to shower. The room had no access to water. I could not take the burning so I  
Start kicking the door for water. The correction officers came to the rub room and I went to  
the Floor voluntarily, they started hitting my person in the head and took all my clothing.  
My person was naked and felt ashamed. The officers placed me in a chair and with the hand  
Cuffs to tight. All I could do was cry and the more I moved It hurt worst on the cuffs.  
I felt sexually assaulted. (made a report with the Yakima county jail)

Yakima County Superior court dismiss all charges against my person for lack of  
Jurisdiction.





**V. INJURIES**

*If you sustained injuries related to the events alleged above, describe them here.*

Pepper sprayed: burning lungs, eyes and skin.

Assaulted back, neck and buried chess (pictures token)

Assaulted hand cuffs could not feel my hands and feet for months

Arrested lost of freedom

Trauma, depression and anxiety.

Kiddnapped

**VI. RELIEF**

The relief I want the court to order is:

☒ Money damages in the amount of: \$ 10,000,000.00

☐ Other (explain):

**VII. CLOSING**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending or modifying existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

10-18-2021

Dated

Tobias Laddnout

Plaintiff's Signature

Laddnout Tobias J

Printed Name (Last, First, MI)

201 Mamachat Lane Wenatchee WA 98951

Address

City

State

Zip Code

925-324-8534

Telephone Number

tladdnout@gmail.com

E-mail Address (if available)

*List the same information for any additional plaintiffs named. Attach additional sheets of paper as necessary.*